

Hearing Date and Time: November 18, 2009 at 10:00 a.m. (Prevailing Eastern Time)  
Objection Date and Time: November 13, 2009 at 10:00 a.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	
	:	Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS, INC., <i>et</i>	:	
<i>al.</i> ,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	X	

**JOINDER OF THOMAS COOK AG TO OMNIBUS OBJECTION  
OF CERTAIN CREDITORS TO DEBTORS' MOTION, PURSUANT  
TO BANKRUPTCY RULE 2004, FOR AN ORDER GRANTING  
AUTHORITY TO ISSUE SUBPOENAS FOR THE PRODUCTION OF DOCUMENTS  
AND AUTHORIZING THE EXAMINATION OF PERSONS AND ENTITIES**

Thomas Cook AG ("**Thomas Cook**"), by and through its undersigned counsel, hereby joins in the Objection of Certain Creditors to Debtors' Motion, Pursuant to Bankruptcy Rule 2004, for an Order Granting Authority to Issue Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities [ECF No. 5807] (the "**Objection**"). As supplemented below, Thomas Cook adopts the arguments and authorities cited in the Objection and reserves its right to be heard at the scheduled hearing on this matter.

Thomas Cook adds that it does not object to providing the Debtors with any information required by law, provided that it is afforded adequate time to prepare an appropriate response to

any request for information by the Debtors. However, Thomas Cook asserts that the ten and fifteen day response periods for which the Debtors seek Court approval would provide Thomas Cook with insufficient time to prepare an appropriate response. The short timeframes requested by the Debtors would be particularly burdensome to Thomas Cook, because much if not all of Thomas Cook's records regarding, and personnel with knowledge of, its creditor relationship with the Debtors are located in Europe, posing obvious logistical difficulties.

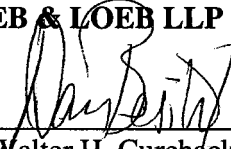
**CONCLUSION**

WHEREFORE, Thomas Cook respectfully requests that the Court deny the Motion; or, in the alternative, approve the Motion as modified in a manner consistent with the Objection; and grant Thomas Cook such other and further relief as is just and proper.

Dated: November 13, 2009  
New York, New York

Respectfully submitted,

**LOEB & LOEB LLP**

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